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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

THOMAS ROGER WHITE, JR. and
PATRICIA CAULEY on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

SAMSUNG ELECTRONICS
AMERICA, INC. and SONY
ELECTRONICS INC.,

Defendants.

Civil Action No. 17-1775 (MCA) (JAD)
Hon. Madeline Cox Arleo, U.S.D.J.
Hon. Joseph A. Dickson, U.S.M.J.

Document Electronically Filed

Return Date: June 15, 2020

ORAL ARGUMENT REQUESTED

**NOTICE OF MOTION TO
COMPEL INDIVIDUAL
ARBITRATION AND STRIKE
PLAINTIFFS' CLASS CLAIMS**

PLEASE TAKE NOTICE that on June 15, 2020, or at such other date and
time as may be set by the Court, Defendant Samsung Electronics America, Inc.

(“SEA”), by and through its undersigned attorneys, shall move for an Order granting Samsung’s Motion To Compel Individual Arbitration And Strike Plaintiffs’ Class Claims.

. **PLEASE TAKE FURTHER NOTICE** that in support of this Motion, Defendant will rely on the accompanying Brief In Support of Samsung’s Motion to Compel Individual Arbitration and Strike Plaintiffs’ Class Claims, Declaration of Randy Chung with exhibits, and all pleadings and proceedings on file.

PLEASE TAKE FURTHER NOTICE that a Proposed Form of Order is being submitted herewith.

PLEASE TAKE FURTHER NOTICE that Samsung hereby requests oral argument.

Dated: May 22, 2020

Respectfully submitted,

By: s/ Michael R. McDonald
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